

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	No. 2:23-cr-20121-TLP
v.)	
)	
ASHLEY GRAYSON,)	
Defendant.)	

**GOVERNMENT’S RESPONSE IN RESPONSE TO THE DISTRICT COURT’S ORDER
TO SHOW CAUSE
AND
UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE**

COMES NOW, the United States of America, by and through the undersigned, and hereby files its response to the District Court’s Order to Show Cause. (RE-191). For the reasons set forth, the United States respectfully petitions the Court to accept, out of time, a Motion for Extension to File a Response.

The undersigned counsel apologizes for not filing a timely extension to respond to this Motion for Reconsideration of Denial of Motion for Mistrial. The record in this case is voluminous. This is not the first motion for a new trial nor is it the United States’ first response to such a motion. While I was working on other matters, indicting a new case and getting discovery together in a case before Your Honor, I asked someone else to review all of the filings and rulings to see if there was any issue that the United States had failed to address in any of its previous filings. This review of motions, responses, and rulings was an extensive and time-consuming process that was just completed. The United States should have filed for extension and asks the Court to accept this motion for extension out of time. The United States respectfully request an additional 10 days to respond to Defendant’s Motion for Reconsideration of Denial of Motion for

Mistrial.

The United States has consulted with attorneys for Defendant who have no objection to the United States request for an extension.

Opposing counsel and the United States are negotiating to see if the parties can come to a joint sentencing recommendation, which might also render moot some of the issues before this Court. This extension will allow the parties to negotiate, and it will afford the United States time to respond if negotiations are unsuccessful.

Conclusion

Based on the foregoing, The United States respectfully petitions the Court to grant, out of time, a Motion for Extension to File a Response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, P. Neal Oldham, Assistant United States Attorney for the Western District of

Tennessee, hereby certify that a copy of the foregoing Motion has been forwarded to defendant's attorneys via the court's electronic delivery system.

s/P. Neal Oldham

P. Neal Oldham

Assistant United States Attorney